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# **VERIFICATION GUIDANCE**

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School Food Service Section  
Missouri Department of Elementary and Secondary Education

## TABLE OF CONTENTS

	<u>Page</u>
1. Introduction.....	1
2. Verification of Eligibility for School Meals .....	2
Definition .....	2
Exemptions from Verification .....	2
General Requirements.....	2
Implementation .....	3
Random Sampling.....	3
Focused Sampling.....	4
Verification at the Time of Application.....	6
Household Notification of Selection for Verification.....	7
Verification Methods .....	7
Verification of Income Eligibility.....	8
Verification of Categorical Eligibility .....	10
Completion of Verification.....	11
Verification Results .....	11
Notification of Adverse Action.....	12
Benefits During Appeal of Verification Results .....	12
Hearing Procedure .....	12
Households that Reapply for Program Benefits.....	12
Recordkeeping .....	13
3. Questions and Answers.....	14
4. Random Sampling Worksheet .....	16
5. Focused Sampling Worksheet.....	17
6. Letter to Households – Notification of Selection for Verification.....	18
7. Social Security Numbers.....	19
8. Verification Information for Free and Reduced Price Meals.....	20
9. Letter Household May Have Employer Complete - Statement of Earnings .....	21
10. Letter Household May Have Social Security Office Complete - Social Security and/or Supplemental Security Income .....	22
11. Letter to the Food Stamp/Temporary Assistance Office from the School Food Authority.....	23
12. Verification Form – Food Stamp/Temporary Assistance Recipients .....	24
13. Letter Household May Have Food Stamp/Temporary Assistance Office Complete – Statement of Benefits .....	25
14. Letter of Verification Results and Adverse Action for Income Households.....	26
15. Letter of Adverse Action for Food Stamp/Temporary Assistance Households.....	27
16. Notification of Continuation of Benefits as a Result of Verification .....	28
17. Free and Reduced Price Application Income Verification Documentation.....	29
18. Verification Summary.....	30

## INTRODUCTION

Guidance is provided for the verification requirements set forth in regulations issued by the United States Department of Agriculture on June 26, 1984. This guidance sets forth guidelines for school officials responsible for verification of free and reduced price meal applications under the National School Lunch and School Breakfast Programs.

The following explanation of acronyms is provided:

SA	-	State Agency
LEA	-	Local Education Agency
FNS	-	Food and Nutrition Service
FNSRO		Food and Nutrition Service Regional Office
IEGs		Income Eligibility Guidelines
RCCI		Residential Child Care Institution

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# Verification of Eligibility for School Meals

## Definition

Verification is confirmation of eligibility for free and reduced price meals under the National School Lunch Program or School Breakfast Program. Verification must include either confirmation of income eligibility or confirmation that the child is included in a currently certified Food Stamp household or Temporary Assistance unit. At State or local discretion, verification may also include confirmation of any other information on the application which is required as a condition of eligibility.

## Exemptions from Verification

1. Verification efforts are not required in:
  - a) Instances where children have been approved under Direct Certification procedures.
  - b) RCCIs, except for applications for any day students attending the institution.
  - c) Schools in which FNS has approved special cash assistance claims based on economic statistics regarding per capita income, e.g., Puerto Rico and the Virgin Islands.
  - d) Schools in which all children are served with no separate charge for food service and no special cash assistance is claimed, e.g., non pricing programs claiming only the paid rate of reimbursement.
  - e) Schools participating in the Special Milk Program (Note: Schools may choose not to count applications for children in split-session kindergarten programs participating in the Special Milk Program in meal program schools when determining the verification sample size.)
  - f) LEAs in which all schools participate in the Special Assistance Certification and Reimbursement Alternatives except in those years in which applications are taken for all children in attendance.

## General Requirements

1. Annually, each LEA must select and verify a sample of applications approved for benefits, unless the SA assumes responsibility for verification or the LEA is otherwise exempt from the verification requirement.
2. LEAs must use either a “**random**” sampling method or “**focused**” sampling method to select applications to be verified. (The SA may require all its LEAs to do either random or focused sampling.)
3. The required sample size is based on (1) the total number of approved applications on file on October 31 and (2) whether the LEA employs random or focused sampling for selecting the applications to be verified.
  - a) Under random sampling the LEA must verify a minimum of the lesser of 3 percent or 3,000 of the total number of approved applications, selected randomly.

- b) Under focused sampling, the LEA must verify a minimum of (1) the lesser of 1 percent or 1,000 of the total number of approved applications, selected from applications with total household income within \$100 monthly or \$1,200 annually of the IEGs for free and reduced price meals; **PLUS** (2) the lesser of .5 percent (one half of 1 percent) or 500 of the total number of applications that were approved based on categorical eligibility, selected from applications with a Food Stamp or Temporary Assistance number.
4. Do NOT include students approved in the Direct Certification process.
5. The LEA must complete verification of the minimum required sample size by December 15.
6. Verification must take place after the application has been approved even when the LEA requires households to submit documentation of eligibility with the application.

## Implementation

1. Although the required sample size under both random and focused sampling is based on the number of approved applications on file on October 31, LEAs may begin verification prior to this date. LEAs may project the number of approved applications that they anticipate will be on file on October 31. However, the LEA must compare this estimate with the actual number of applications on file on October 31 and increase the sample size if the total number of approved applications on file exceeds the estimate.
2. LEAs may verify more than the required minimum sample, up to 100 percent of all approved applications, as long as the selection of applications does not involve discrimination against anyone on the basis of race, color, national origin, age, sex, disability or political beliefs. The LEA has an obligation to verify all questionable applications.
3. The LEA must complete the verification process for all households that have been notified of their selection for verification and have been asked to submit verification information. For example, the LEA cannot select 5 percent of the applications on file and notify those households of their selection with the hopes of getting 3 percent to respond to fulfill the verification requirement. The LEA must follow-up with any household notified of their selection.
4. SAs that are assuming the verification responsibility for any or all of its LEAs may use a method other than random or focused selection.
5. **When calculating sample sizes, round all fractions or decimals upward to the nearest whole number.**

## Random Sampling

1. Under the random sampling method, each application must have an equal chance of being selected.
2. **Required Random Sample Size and Selection:** The minimum required sample size is 3 percent or 3000, whichever is less, of all approved applications on file on October 31.
3. Calculation and selection of the minimum required number of applications in the LEA to verify under random sampling:

Step 1. Count the total number of approved applications on file on October 31. Multiply the total by .03. Round decimals upward. At least one application must be verified.

e.g., 300 applications x .03 = 9 applications.

Step 2. Compare the result in step 1 to 3,000. The sample size is the lesser number.

e.g., 9 applications must be verified to meet the required sample size.

Step 3. Randomly select the required number of applications.

1. A selection interval may be used. This can be accomplished by dividing the total number of approved applications on file in the LEA by the sample size to determine the selection interval (if there are 300 applications on file and 9 are required to be verified, divide 300 by 9 = 33.3. In this case, the selection interval is 33. Number all the applications. Randomly select an application from the total approved, and then choose every 33<sup>rd</sup> application until 9 applications have been selected.
2. Another random method of selection would be to put all the applications in a container and draw the required number of applications.

## **Focused Sampling**

1. A minimum required percentage or number of applications approved based on income eligibility must be selected for verification and a minimum required percentage or number of applications approved based on categorical eligibility must be selected for verification.

### **2. Required Focused Sample Size and Selection of Applications -**

- a) For applications approved based on income information:  
1 percent of the total number of all approved applications in the LEA or 100 applications, whichever is less (the calculation includes applications approved based on income eligibility and those approved based on categorical eligibility).

Select the 1 percent from applications that were approved based on household size/income information and that indicate total household income within \$100 (\$1200 yearly) of the income eligibility guidelines.

**and**

- b) For applications approved based on categorical eligibility:  
.5 percent of the total number of applications in the LEA approved based on categorical eligibility or 500 applications, whichever is less;

Select the .5 percent from the applications approved based on categorical eligibility

3. The calculation of the minimum required number of applications with income information and the minimum number of applications with Temporary Assistance/Food Stamp case numbers that must be verified in the LEA under focused sampling follows:

**Step 1.** To determine the number of applications with income information that must be verified, count the total number of approved applications on file on October 31. Multiply this number by 1 percent, round any decimals up.

e.g., 50 applications with income information plus 250 applications with Food Stamp/Temporary Assistance numbers = 300 total applications  $\times .01 = 3$  applications.

**Step 2.** Compare the result in Step 1 to 1000. The required number of applications with income information to verify is the lesser number. In this case, 3 applications approved based on income eligibility must be verified.

**Step 3.** To determine the number of applications with Food Stamp/Temporary Assistance numbers that must be verified, count the number that were approved based on categorical eligibility. Multiply this number by .005, round any decimals up.

e.g., 250 applications with Food Stamp/Temporary Assistance numbers  $\times .005 = 1.25 = 2$  applications.

**Step 4.** Compare the result in Step 3 to 500. The required number of applications with a Food Stamp/Temporary Assistance number to verify is the lesser number. In this example, 2 applications approved based on categorical eligibility must be verified.

**Step 5.** Separate the applications into two groups: (1) the categorically eligible applicants that provided a Temporary Assistance or Food Stamp number; and (2) the applicants that were approved on the basis of income information.

**Step 6.** From the group that reported income information, select the required sample size (as determined in Step 2) from applications with monthly incomes within \$100 or annual income within \$1,200 of the income eligibility limits.

If there are more applications with monthly income within these limits than needed to meet the minimum sample size, select the sample using any method that is equitable and ensures that the same households will not be selected year after year.

If there are not enough applications within the limits to meet the required minimum sample size, complete the sample using those applications with monthly income closest to the eligibility levels.

If the total number of applications containing income information is smaller than the required minimum sample size, verify all applications approved on the basis of the income information.

**Step 7.** From the categorically eligible group, select the sample using any method that is equitable and ensures that the same household is not selected each year.

A minimum of one categorically eligible application and one income application must be verified.

### **Verification at the Time of Application**

1. LEAs may require households to provide information to verify eligibility for free and reduced price benefits at the time of application. Schools electing this option are cautioned that they must not allow verification efforts to delay the approval of applications; nor can schools disapprove applications based on information submitted for verification. If an application is complete and indicates that the child is eligible for free or reduced price benefits, the application must be approved. Only after the determination of eligibility has been made can the school begin the verification process. Schools electing this option must observe the following procedures:
  - a) Notice to Household - Include in the notice to the household a statement that, although the initial eligibility determination will be based solely on the application, households are required to submit verification of eligibility information with the application.
  - b) Determination of Eligibility - As applications are returned, review each application to determine household eligibility based on the submission of a complete application. Households must be informed of this initial determination of eligibility. **Lack of verification information or submission of verification information that does not support the content of the application must not affect the initial determination of eligibility.**
  - c) Review of Verification Documentation and Notice of Adverse Action - Any household which fails to submit requested verification information by the date specified by the LEA or which submits verification information which does not support the initial determination of eligibility must be sent a notice of adverse action. This notice **MUST** include all the required items in the standard termination/reduction notice, including giving the household 10 days advance notice of the termination or reduction of their benefits. (Note: This step may be combined with Step 2 so that the notice of initial approval and notice of adverse action are combined in a single letter.)

Once households have been notified of selection and requested to provide income documentation, the LEA must complete the verification process for such households. Verification efforts should be completed within a reasonable time.



## **Household Notification of Selection for Verification**

1. When a household is selected for verification and is required by the LEA to submit documents or other forms of evidence to document eligibility, the household must be sent a notice/letter informing them of their selection and of the types of information acceptable to the LEA (see pages 18-20). The letter/notice must include the following:
  - a) That the household has been selected for verification.
  - b) That the household must provide the social security number for each adult household member or indicate that a household member does not possess one.
  - c) A Privacy Act statement (See page 19 for the Privacy Act Statement).
  - d) The types of acceptable information that may be provided to confirm current income, including pay stubs, award letters from welfare departments, social security, and support payment decrees from courts (See page 20 for an example).
  - e) That the household **MUST** submit documentation of income received during the most recent month that is available. If this amount is not representative, the household should contact the LEA for assistance in determining acceptable documentation.
  - f) That the household may provide proof that the child is a member of a currently certified Food Stamp/Temporary Assistance household instead of providing income information and social security numbers of adult household members.
  - g) That information must be provided by a date as specified by the LEA and that failure to do so will result in termination of benefits.
  - h) The name and telephone number of a school official who can answer questions and provide assistance.
2. When the LEA uses agency records (see Agency Records on page 8) to verify eligibility, the letter/notice of selection is **NOT** required, since the household will not have to provide documents and household cooperation will not be necessary.

## **Verification Methods**

1. Written Evidence - Written evidence is the primary source of eligibility confirmation for all households including Food Stamp and Temporary Assistance households.
  - a) Written evidence is most often pay stubs from employers or award letters from welfare departments or other government agencies submitted by the household to the verifying officials as confirmation of eligibility.
  - b) Acceptable written evidence contains the name of the household members, amount of income received, frequency received, and the date.
2. Collateral Contacts - A collateral contact is a person outside of the household who is knowledgeable about the household's circumstances and can give confirmation of a household's income or Food Stamp/Temporary Assistance status.
  - a) Collateral contacts include employers, social service agencies,

- migrant workers' agencies, and religious or civic organizations.
- b) The verifying official should request a collateral contact only in cases when the household has not been able to provide adequate written evidence.
  - c) The verifying official must give the household the opportunity to designate the collateral contact. However, the verifying official may select a collateral contact if the household fails to designate one or designates one which is unacceptable to the verifying official. In either case, no contact may be made without first notifying the household and obtaining their permission.
  - d) All collateral contacts are to be documented, dated, and initialed.
3. Agency Records - A household's eligibility may be confirmed through the use of information maintained by other government agencies to which the SA, LEA, or school has legal access. Although USDA regulations do not require that households be notified of selection when verification is made through agency records, such agencies may have their own notification requirements.
- a) One source of agency records is the wage and benefit information maintained by the state employment agency, if that information is available to the verifying official. Such records are state records, and the release of information maintained by state employment offices is governed by state law.
  - b) The LEA may also submit the names and case numbers of categorically eligible households to the local Food Stamp or Temporary Assistance office. Food Stamp/Temporary Assistance offices are permitted by law to release eligibility information from their files to other federal assistance programs and federally-assisted state programs.
  - c) When using agency records, the LEA should request information for the most recent month available. Households which dispute the validity of income information acquired through systems of records must be given the opportunity to send more recent income information during the 10-day period of advance notice of adverse action. (See page 27).

## **Verification of Income Eligibility**

### Request for Written Evidence

1. The notification of selection for verification (sample on page 18) must include a request for the household to submit written evidence of current income for all household members and the social security number of each adult household member 21 years of age or older.
2. One of the following three situations will result:
  - a) The household submits the required social security numbers and written evidence of current income that confirms the eligibility determination previously made. Verification is considered complete.
  - b) The household submits the required social security numbers and written evidence of current income that shows the household's

eligibility should be for either a higher or lower level of benefits than the eligibility determination previously made. Verification is considered complete when the letter of adverse action is sent or the household is notified that its benefits will be increased.

- c) The household does not respond to the request for income information and/or social security numbers or submits insufficient or obsolete evidence. When either situation occurs, the LEA can do one of two things:
  - i) School officials may contact the household to request the missing written evidence and inform the household that failure to comply or to designate a collateral contact will result in termination. If the household subsequently cooperates, then either a) or b) would apply.
  - ii) School officials may terminate the household for failure to respond to the request for written evidence. Verification is considered complete when the advance notice of adverse action is sent to the household.

#### Verification Using Collateral Contacts

1. When the household has been unable to provide adequate written evidence, the household may identify a collateral contact from which the LEA could obtain the requested information, either orally or in writing.
2. A collateral contact would not be expected to provide social security numbers of the adult household members. These still **MUST** be provided by the household.
3. The LEA will examine any written information provided by the collateral contact or evaluate any oral information. Based on this, either situation a) or b) would apply.
4. If the collateral contact is unwilling or unable to provide the requested information, then the household is to be terminated for failure to respond as discussed in c).

#### Verification Using Agency Records

1. A household's eligibility may be confirmed through the use of information maintained by other government agencies to which the LEA has legal access. See page 8 for more details.
2. The LEA will examine the information received from the agency. Based on this review, either situation a) or b) would apply. Except that, households which dispute the validity of the information **MUST** be given the opportunity to provide more recent income information during the 10-day advance notice period of adverse action.

#### Advance Notice of Adverse Action

1. All households with children for whom benefits are to be reduced or terminated **MUST** be given 10 days written advance notice of the change.
2. The first day of the 10 day advance notice period is the day the notice is sent.
3. A sample notification of adverse action is on page 26 and 27.

## **Verification of Categorical Eligibility**

### Request for Written Evidence

1. A school can place the responsibility for verifying receipt of Food Stamps/Temporary Assistance benefits on the household. The notification selection (sample on page 25) **MUST** include a request for the household to submit written evidence of current certification to receive Food Stamp/Temporary Assistance benefits. Every time a household is approved for Food Stamps/Temporary Assistance, they are furnished with a written letter of certification or notice of eligibility. The verifying official should examine this notice of eligibility to ensure that the child for whom application was made is part of a household currently participating in the Food Stamp/Temporary Assistance Program
2. A Food Stamp/Temporary Assistance document that does not specify the certification period is not adequate for documentation. For example, the food stamp identification card is not acceptable because it usually does not have an expiration date.
3. A household that does not have satisfactory Food Stamp/Temporary Assistance documentation may request a signed, dated letter from the Food Stamp/Temporary Assistance office certifying that the child is part of a household currently receiving benefits.
4. Verification is complete when the household submits adequate documentation of current participation in either the Food Stamp/Temporary Assistance Program or a letter of adverse action is sent.

### Agency Records

1. Verification of eligibility for households that provided a Food Stamp/Temporary Assistance number on the application may be accomplished by submitting a list of names and Food Stamp/Temporary Assistance numbers to the local food stamp or welfare office for confirmation of receipt of benefits (Agency records).
2. To facilitate the verification process, contact should be made with the local food stamp/welfare office prior to submitting such lists to discuss the methods by which verification requests should be handled. LEAs that verify eligibility through the local Food Stamp/Temporary Assistance office should do so as early as possible. This will ensure that there is sufficient time for that office to respond to the request, and sufficient time to acquire other verification if households are identified as not currently receiving Food Stamps/Temporary Assistance or if the Food Stamp/Temporary Assistance office does not respond in a timely manner. If circumstances beyond the control of the LEA delay verification, the LEA may request that the SA allow an extension of the verification deadline. Any extension of the deadline must be approved by FNSRO.
3. A sample letter and a form for LEAs to use in requesting assistance from a Food Stamp/Temporary Assistance Office are included on pages 23-24.
4. Verification is complete when the local Food Stamp/Temporary Assistance office certifies that the household is currently receiving Food Stamps/Temporary Assistance or a notice of adverse action is sent.

### Advance Notice of Adverse Action

1. When it is determined that the child is not part of a household currently receiving Food Stamp/Temporary Assistance, the household **MUST** be given 10 days written advance notice of termination and **MUST** be informed that to continue school meal benefits they **MUST**:
  - a) Submit an application providing income information.
  - b) Submit names and social security numbers for each adult household member.
  - c) Submit written evidence which confirms current household income.
2. The first day of the 10-day advance notice period is the day the notice is sent.
3. A sample notification of adverse action for Food Stamp/Temporary Assistance households is on page 27.

### **Completion of Verification**

1. Verification of the required sample size **MUST** be completed by December 15 of each year. If the LEA believes that it will not meet this deadline, a written request for an extension **MUST** be submitted to the SA prior to December 15. This request **MUST** then be submitted to FNS for approval.
2. Verification of an individual application is complete when a household's eligibility for the level of benefits for which it was approved is:
  - a) Confirmed.
  - b) Changed to a higher level of benefit.
  - c) A letter of adverse action has been sent informing the household that benefits will be reduced.
  - d) A letter of adverse action has been sent informing the household that benefits will be terminated.

### **Verification Results**

1. Verification of a household's income eligibility for free or reduced price meals **MUST** result in one of the following:
  - a) No change in benefit level - The household's current documentation supports the level of benefits for which the household has been approved.
  - b) Reduction in benefit level - The household's current documentation identifies income too high for the level of benefits for which the child has been approved. Therefore, the household's eligibility must be changed from free to reduced price or from reduced price to full price.
  - c) Increase in benefit level - The household's current documentation qualifies the household for free meals rather than reduced price meals. Therefore, the household's eligibility **MUST** be changed from reduced price to free meals.
  - d) Termination of benefits - Free and reduced price benefits **MUST** be terminated for households that do not respond to verification efforts or whose current documentation does not support eligibility for either free or reduced price meals.
2. If verification results in a change in benefit level or termination, the change **MUST** be extended to all children in the household who were determined eligible by information which no longer supports the benefit level.

3. If verification results in higher benefits (e.g., a child who is moved from the reduced price to free category), this change is effective immediately. Parents should be notified through whatever channels the LEA uses to notify the household of approval for benefits.

### **Notification of Adverse Action**

1. All households for whom benefits are to be reduced or terminated **MUST** be given 10 calendar days advance notice of the change.
2. The first day of the advance notice period is the day the notice is sent.
3. The notice **MUST** advise the household of the following:
  - a) The change in benefits.
  - b) The reasons for the change.
  - c) That an appeal **MUST** be filed within the 10-day advance notice period to ensure continued benefits while awaiting a hearing and decision.
  - d) The instructions on how to appeal.
  - e) That the household may reapply for benefits at any time during the school year.
  - f) That Food Stamp/Temporary Assistance households may submit an application containing household names and income information and provide written evidence of current household income and the social security numbers of adult household members.

### **Benefits During Appeal of Verification Results**

1. When the household appeals a reduction or termination of benefits within the 10 calendar day advance notice period, the LEA **MUST** continue to provide the benefits for which the child was originally approved until a final determination is made.
2. When a household does not appeal a reduction or termination of benefits during the 10 calendar day advance notice period, the actual reduction or termination of benefits **MUST** take place immediately after the 10-day advance notice period.

### **Hearing Procedure**

1. The hearing procedure in the LEA's free and reduced price policy statement **MUST** be followed.
2. The hearing official **MUST** be an individual who was not connected with the approval or verification process.
3. The household may request a school conference prior to a formal hearing. Any such conference **MUST NOT** prejudice a later appeal.

### **Households that Reapply for Program Benefits**

1. Households affected by a reduction or termination of benefits may reapply for benefits at any time during the school year. However, those households terminated for failure to respond to verification efforts that reapply in the same school year may be required to submit income documentation or proof of participation in the Food Stamp/Temporary Assistance Programs at the time of reapplication. The LEA may verify the household's eligibility prior to approval. These are not considered new applications, since these households did not comply with the verification requirements.

## **Recordkeeping**

1. Documentation is useful in demonstrating compliance with the verification requirements when LEAs are reviewed by the State and would also be needed in case of an applicant's appeal.
2. LEAs **MUST** maintain a description of their verification efforts. The description **MUST** include:
  - a) A summary of the verification efforts, including the selection process and the source of information used, such as the Food Stamp Office, wage stubs, and collateral contacts.
  - b) The total number of applications on file on October 31.
  - c) The percentage or number of applications that are/will be verified by December 15.
  - d) Reasons for any denial or change of eligibility and the date.
3. All verified applications must be readily retrievable by school and include all documents submitted by the household in an effort to confirm eligibility, reproductions of those documents, or annotations made by the determining official which indicate which documents were submitted by the household and the date of submission.
4. All relevant correspondence between the household selected for verification and the LEA/school.
5. Results of verification and documentation/dates of any changes in eligibility or denial and the reasons for the changes or denial.
6. LEAs should keep a full record of:
  - a) Date notices were sent.
  - b) Notes on any contacts made.
  - c) Signature of the verifying official.
7. See page 29, Verification Record.

## Questions and Answers

1. Q. What kind of written evidence is required for verification of a foster child's application?
  - A. School officials should contact the household in which the foster child resides and ask for the name, agency and phone number of the social worker assigned to that child. A phone call to the social worker confirming the child's status as a foster child and the amount of money designated by the agency for the child's personal use would be sufficient verification. The school official should, document the phone conversation with the social worker (identifying the social worker, agency and phone number, the status of the child and the child's personal use income). Another approach would be to ask the foster family for a copy of a written communication between the foster family and the placement agency, in which the status of the child and the financial arrangement is stated. If the family is unable to provide such information, a phone call to the placement agency to confirm the child's status and income should be made prior to denying the child for free meals.
2. Q. What if a child is selected for verification, but then transfers out of the school district before the information can be verified?
  - A. Verification is considered complete when a household's eligibility for the level of benefits for which it was approved is either confirmed or a letter of adverse action has been sent. If a child is selected for verification but transfers out of the district before the information can be verified, verification cannot be completed. To meet the minimum verification requirements, a new application **MUST** be selected.
3. Q. What if I use other Agency records and the Agency does not provide a response before December 15?
  - A. Any extensions to the December 15 deadline **MUST** be approved in writing by FNS. If the LEA contacted another agency well in advance of the December 15 deadline, it has demonstrated good faith and would likely be given an extension.
4. Q. How is overtime income counted for the purposes of verification?
  - A. The school official should work with the household to determine whether the overtime for the month being verified is representative of overtime received in other months. If the overtime is a one-time or sporadic source of income, income should be calculated based on the regular monthly income (without overtime).
5. Q. Am I verifying eligibility at the time of application or current eligibility?
  - A. Verification is intended to establish current eligibility. When written evidence or collateral contacts are the primary sources of information, the LEA **MUST** require submission of income information for the most recent full month that is available. When using a system of records, the LEA may choose to verify a recent month and the entire sample may be verified for the same month. Households that dispute the validity of income information acquired through systems of records **MUST** be given the opportunity to produce more recent income information.



6. Q. If a LEA chooses to do 3 percent verification, MUST it select 3 percent of the applications from each school in the LEA or is the sample selected from the LEA as a whole?
- A. LEAs are required to select and verify a sample of their approved free and reduced price applications. The LEA as a whole MUST meet the 3 percent sample. It does not mean that each school has to do 3 percent. The sample may be selected from one or more schools or from the LEA as a whole, provided that the verification efforts are applied without regard to race, color, national origin, sex, age, or disability. Also, any selection method MUST ensure that all applications are subject to being sampled; e.g., if the LEA has decided to select the 3 percent verification sample from only one school in the LEA, all applications in that one school MUST have an equal chance of being selected.
7. Q. If my sample size is 4.2 applications, do I verify 4 or 5?
- A. 5. Partial numbers must be rounded up to the next whole number.
8. Q. If a larger sample is selected, such as 5 percent, does the 5 percent have to be verified by December 15?
- A. The LEA only has to meet the minimum sample requirements, e.g. 3 percent under random sampling, by December 15. The remaining 2 percent, while it has to be completed, may be completed after December 15.
9. Q. Do we have to maintain the actual documentation from verification or just the results of verification?
- A. LEAs are required to maintain a description of their verification efforts. The description MUST summarize the selection process and source of information used, the total number of applications on file on October 31, and the percentage or number of applications verified. \*LEAs MUST maintain certain records of the actual information received, particularly records for those households whose benefits are reduced or terminated, since the actual documentation would be useful in supporting the verification findings if appealed by the household. \*See Recordkeeping, page 13.
10. Q. Must LEAs include children from households approved under the Direct Certification process in the verification samples?
- A. No. Households certified under Direct Certification have already undergone a stringent application process for assistance and have had their eligibility verified under the Food Stamp or Temporary Assistance programs. Therefore, households approved for free meal benefits under Direct Certification are to be excluded from verification. LEAs must still select the appropriate minimum sample size from actual applications submitted. Accordingly, the size of the sample is based only on the number of approved applications submitted and not on the total of eligibility determinations.

## RANDOM SAMPLING WORKSHEET

### REQUIRED SAMPLE SIZE

Number of approved applications on file on 10/31:

\_\_\_\_\_

x .03

\_\_\_\_\_

\_\_\_\_\_ or 3,000 applications, whichever is less.  
(round all decimals up)

Randomly select the required number of applications.

## FOCUSED SAMPLING WORKSHEET

### Required Number Of Applications With Income Information To Verify

Total number of approved applications on file 10/31:

$$\begin{array}{r} \underline{\quad\quad\quad} \\ \times \quad .01 \\ \hline \end{array} \text{ or 1,000 applications, whichever is less.}$$

(round all decimals upward)

From the applications with income information, select applications with reported income information, select applications with reported income within \$100 a month (\$1200 a year) of the free and reduced price eligibility levels. Continue selecting applications until the required number of applications are chosen.

### Required Categorically Eligible Sample

Total number of categorically eligible applications.

$$\begin{array}{r} \underline{\quad\quad\quad} \\ \times \quad .005 \\ \hline \end{array} \text{ or 500 applications, whichever is less.}$$

(round all decimals upward)

From the applications with a Food Stamp or Temporary Assistance number, select applications until the required number of applications is chosen.

**LETTER TO HOUSEHOLDS  
NOTIFICATION OF SELECTION FOR VERIFICATION OF ELIGIBILITY**

(student's name)

(school)

(date)

Dear: \_\_\_\_\_

This letter requires that you send information or contact (official's name) by (date).

Your child's application has been selected as part of a review to make sure only eligible students receive free or reduced price meal benefits.

You must send **either** (1) papers that show that you receive Food Stamps or Temporary Assistance for your child **or** (2) the names and social security number of each adult household member on the enclosed sheet and papers that show your household's current income.

We have enclosed information that shows the kinds of papers that you may use to prove that you now receive Food Stamps or Temporary Assistance for your child or to show your household's income. If possible, do not send original papers. If you do send original documents, they will be sent back to you only if you ask.

If you do not send information that proves your child is eligible to receive free or reduced price meal benefits by (the date above), these meal benefits will be stopped.

If you have any questions, or if you need any help, please call:

\_\_\_\_\_, Telephone number:\_\_\_\_\_. If you do not hear from us by (date), free or reduced price meals will continue without change.

Thank you for your cooperation in this matter.

Sincerely,

Enclosures (Form for Social Security Numbers/Verification Information for Free and Reduced Price Meals)

In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability.  
To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call (202) 750-5964 (voice and TDD). USDA is an equal opportunity provider and employer."

## SOCIAL SECURITY NUMBERS

If you do not show that you now receive Food Stamps or Temporary Assistance for your child, send in (1) papers that show your current household income and (2) the name and the social security number of each household member 21 years of age or older in the spaces below. Write the word “none” if an adult household member does not have a social security number.\*

Names of adult household members

Social security number

1. \_\_\_\_\_

\_\_\_\_\_ - \_\_\_\_\_ - \_\_\_\_\_

2. \_\_\_\_\_

\_\_\_\_\_ - \_\_\_\_\_ - \_\_\_\_\_

3. \_\_\_\_\_

\_\_\_\_\_ - \_\_\_\_\_ - \_\_\_\_\_

4. \_\_\_\_\_

\_\_\_\_\_ - \_\_\_\_\_ - \_\_\_\_\_

5. \_\_\_\_\_

\_\_\_\_\_ - \_\_\_\_\_ - \_\_\_\_\_

6. \_\_\_\_\_

\_\_\_\_\_ - \_\_\_\_\_ - \_\_\_\_\_

- Privacy Act Statement: The National School Lunch Act requires that, unless you show that you receive Food Stamps or Temporary Assistance for your child, you must provide the social security number of each adult household member or indicate that the household member does not have a social security number. Provision of a social security number is not mandatory, but if a social security number is not provided for each adult household member or an indication made that an adult household member does not have a social security number, benefits will be terminated. The social security number may be used to identify household members in verifying the correctness of information stated on the application and continued eligibility for the program. These verification efforts may be through program reviews, audits, and investigations and may include contacting employers to determine income, contacting a food stamp or welfare office to determine current certification for receipt of Food Stamps or Temporary Assistance benefits, contacting the State Employment Security Office to determine the amount of benefits received and checking the documentation produced by household members to prove the amount of income received. These efforts may result in a loss or reduction of benefits, administrative claims or legal actions if incorrect information is reported. This information must be provided to each adult household member disclosing his/her social security number.

## VERIFICATION INFORMATION FOR FREE AND REDUCED PRICE MEALS

**FOOD STAMP/TEMPORARY ASSISTANCE HOUSEHOLDS:** If you receive Food Stamps or Temporary Assistance for your child, you only have to send something that shows your household is now receiving them. No other information is required. This can be:

- Food Stamp or Temporary Assistance Certification Notice showing the beginning and ending dates of the certification period
- Letter from the Food Stamp or welfare office stating that you now receive Food Stamps or Temporary Assistance
- ATP Card (Authorization to Participate)

If your child was approved for free meals because you put a Food Stamp or Temporary Assistance number on your child's application, but you no longer receive Food Stamps or Temporary Assistance for your child and want to continue benefits, (1) complete another application with income information for everyone in your household; (2) write the name and the social security number of each adult household member on the application or on another piece of paper and (3) send pay stubs or other papers which show your current income.

**HOUSEHOLDS THAT DO NOT RECEIVE FOOD STAMPS OR TEMPORARY ASSISTANCE:** If you do not receive Food Stamps or Temporary Assistance for your child, (1) write the name and social security number for each adult household member on the enclosed sheet and (2) send copies of information or papers which show your household's current income. Current income is the amount of money your household received last month.

**The papers you send in must show: (1) The amount of the income received; (2) the name of the person who received it; (3) the date the income was received; and (4) how often the income is received.**

To show the amount of money your household received last month, send copies of the following:

- **EARNINGS/WAGES/SALARY FOR EACH JOB:**
  - Current paycheck stub that shows how often it is received
  - Current pay envelope that shows how often it is received
  - Letter from Employer stating gross wages paid and how often they are paid
  - Business or farming papers, such as ledger or tax books
- **SOCIAL SECURITY/PENSIONS/RETIREMENT:**
  - Social Security retirement benefit letter
  - Statement of benefits received
  - Pension award notice
- **UNEMPLOYMENT COMPENSATION/DISABILITY OR WORKERS' COMPENSATION:**
  - Notice of eligibility from State Employment Security Office
  - Check stub
  - Letter from Workers' Compensation
- **CHILD SUPPORT/ALIMONY:**
  - Court decree, agreement or copies of checks received
- **ALL OTHER INCOME:** If you have other forms of income (such as rental income) send information or papers which show the amount of income received, how often it is received, and the date received.

**NO INCOME:** If you have no income, send a brief note explaining how you provide food, clothing and housing for your household and when you expect an income.

If you have any questions, or need help in deciding the kind of information to send, please call: \_\_\_\_\_ Telephone Number: \_\_\_\_\_.

**LETTER HOUSEHOLD MAY HAVE EMPLOYER COMPLETE**  
**STATEMENT OF EARNINGS**

This statement is to confirm that (name of employee) received the following amount of gross income before deductions for taxes, social security insurance, etc. \$\_\_\_\_\_.

- ☐ weekly
- ☐ every two weeks
- ☐ twice a month
- ☐ monthly
- ☐ other \_\_\_\_\_

Please state the date of the paycheck listed above \_\_\_\_\_.

\_\_\_\_\_  
Signature of Employer      Date

\_\_\_\_\_  
Address

\_\_\_\_\_  
Telephone Number

**LETTER HOUSEHOLD MAY HAVE SOCIAL SECURITY OFFICE COMPLETE**  
**SOCIAL SECURITY AND/OR SUPPLEMENTAL SECURITY INCOME**  
**(SSI)**

This statement is to confirm that (Name of Claimant) received the following Social Security \$\_\_\_\_\_ or SSI income \$\_\_\_\_\_ for the month of \_\_\_\_\_.

Signature of Official \_\_\_\_\_ Date \_\_\_\_\_

Address \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Telephone Number \_\_\_\_\_



**LETTER TO THE FOOD STAMP/TEMPORARY ASSISTANCE OFFICE  
FROM THE SCHOOL FOOD AUTHORITY**

Dear \_\_\_\_\_:

The receipt of Food Stamps or Temporary Assistance automatically qualifies child(ren) for free school meals. The regulations for the Food Stamp Program and the Temporary Assistance Program permit Food Stamp and Temporary Assistance offices to release eligibility information to administrators of the National School Lunch and School Breakfast Programs to ensure that only eligible children receive free meal benefits.

Enclosed is a listing of approved free meal applications who have been selected for verification and who have indicated that the child for whom application was made now receives Food Stamps and/or Temporary Assistance benefits. On the enclosed listing, please indicate if these household members are currently participating in the Food Stamps and/or Temporary Assistance Program. This information will be used only to confirm the approved applicant's eligibility for free meal benefits.

Your return of the listing by \_\_\_\_\_ will be appreciated. A self-addressed return envelope is also enclosed for our convenience. If you have any questions, or need additional information, please contact \_\_\_\_\_ at Telephone Number \_\_\_\_\_.

Sincerely,

---

Signature

Date

---

Address

---

Telephone Number

Enclosure (Verification Form-Food Stamp/Temporary Assistance Recipients).

**VERIFICATION FORM - FOOD STAMP/TEMPORARY ASSISTANCE RECIPIENTS**  
**(Multiple Applicants)**

Adult Member Last Name, First	Child's Name Last Name, First	Food Stamp/Temporary Assistance Number	Participates Yes    No

\_\_\_\_\_  
Signature of Food Stamps (Temporary Assistance) Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Address

\_\_\_\_\_  
Telephone Number

**LETTER HOUSEHOLD MAY HAVE FOOD STAMP/TEMPORARY ASSISTANCE  
OFFICE COMPLETE**

**STATEMENT OF FOOD STAMP/TEMPORARY ASSISTANCE BENEFITS**

\_\_\_\_\_  
(Name of Child)

\_\_\_\_\_  
(Name of Parent/Guardian)

This statement is to confirm that the child named above is currently certified to receive Food Stamps or Temporary Assistance benefits. The household's case number is \_\_\_\_\_.

\_\_\_\_\_  
Signature of Food Stamp (Temporary Assistance) Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Address

\_\_\_\_\_  
Telephone

**LETTER OF VERIFICATION RESULTS AND ADVERSE ACTION  
FOR INCOME HOUSEHOLDS**

(Note: Make changes as applicable for the School Breakfast Program)

Child(ren)'s Name(s): \_\_\_\_\_

School: \_\_\_\_\_ Date: \_\_\_\_\_

Dear \_\_\_\_\_:

We have completed verification of your child(ren)'s eligibility.

Starting on (10 calendar days from the date sent) your child(ren)'s eligibility for meals benefits will be:

\_\_\_\_\_ Changed from free to reduced price because your income is over the allowable amount. The reduced price charge is \_\_\_\_\_ cents for lunch and \_\_\_\_\_ cents for breakfast. You must tell the school when your household income increases by more than \$50 per month (\$600 per year) or when your household size decreases.

\_\_\_\_\_ Stopped for the following reason(s):

\_\_\_\_\_ your income is over the allowable amount for free or reduced price meals;

\_\_\_\_\_ you did not provide proof of current eligibility. The following information is missing:

\_\_\_\_\_

Starting immediately your child(ren)'s eligibility for meal benefits will be:

\_\_\_\_\_ Changed from reduced price to free because your income is within the free meal eligibility limits. Your child(ren) will receive meals at no cost. You must tell the school when your household income increases by more than \$50 per month (\$600 per year) or when your household size decreases.

If you are not eligible for benefits now, but have a decrease in household income, become unemployed, or have an increase in the size of your household, you may fill out an application at that time to reapply for benefits.

If you do not agree with the decision, you may discuss it with: \_\_\_\_\_ (verifying official). You also have the right to a fair hearing. If you request a hearing by \_\_\_\_\_ (date), your child(ren) will continue to receive free or reduced price meals until the decision of the hearing official is made. You may request a fair hearing by calling or writing the following official:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Telephone Number: \_\_\_\_\_

Sincerely,

"In accordance with Federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability.

To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call (202) 720-5964 (voice and TDD). USDA is an equal opportunity provider and employer."



MISSOURI DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION  
ADMINISTRATIVE AND FINANCIAL SERVICES  
SCHOOL FOOD SERVICES SECTION  
**FREE AND REDUCED PRICE APPLICATION VERIFICATION SUMMARY**

LEA NAME:

AGREEMENT NUMBER

A. How were the applications to be verified selected?

Random Sample

100% Verified

Focused Sample

Other (specify) \_\_\_\_\_

B. By what date was the verification process completed?

\_\_\_\_\_

C. How many approved free and reduced price  
eligible applications were on file October 31?

\_\_\_\_\_

D. How many applications were verified?

\_\_\_\_\_

E. Percent of applications verified (D divided by C).

\_\_\_\_\_

F. Of the households that submitted documentation of income,  
how many changed from:

1) free eligible to reduced price eligible?

\_\_\_\_\_

2) free eligible to full price?

\_\_\_\_\_

3) reduced price eligible to full price?

\_\_\_\_\_

4) reduced price eligible to free eligible?

\_\_\_\_\_

G. Number of households that did not submit documentation  
of income and status was changed to full price.

\_\_\_\_\_

Signature \_\_\_\_\_  
(Authorized Representative)

Retain a copy on file and submit original to:

Department of Elementary and Secondary Education  
School Food Services Section  
P.O. Box 480  
Jefferson City, MO 65102

For additional information or questions, contact:  
School Food Services Section  
Phone #: 573-751-3526  
Fax #: 573-526-3897

**LETTER OF ADVERSE ACTION FOR FOOD STAMP/TEMPORARY ASSISTANCE  
HOUSEHOLDS**

Dear \_\_\_\_\_:

Date: \_\_\_\_\_

Available records show that your household is not receiving Food Stamps/Temporary Assistance at this time.

To continue benefits for your child:

1. complete a new application with income information;
2. write the name and social security number of each adult household member on the attached sheet of paper; and
3. send in papers that show your household's current income.

Your child's free school meal benefits will be stopped on (insert date 10 days from the above date) unless we receive this information. Any continued free or reduced price meals will depend on your current household income.

If you do not agree with the decision, you may discuss it with (school official) by calling (telephone number).

You also have a right to a fair hearing. This can be done by calling or writing the following official:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Phone: \_\_\_\_\_

If you request a hearing by (insert date 10 days from the date sent), your child will continue to receive free meals until the decision of the hearing official is made.

If you are not eligible for benefits now, but your household circumstances change, you may fill out an application at that time and reapply for benefits.

Very truly yours,

Enclosures (Form for Social Security Numbers/Verification Information for Free and Reduced Price Meals)

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**NOTIFICATION OF CONTINUATION OF BENEFITS  
AS A RESULT OF VERIFICATION**

**(Optional)**

Date: \_\_\_\_\_

Dear \_\_\_\_\_:

Thank you for cooperating with the (name of Local Education Agency) in its verification of eligibility for school meal benefits. The materials you have sent are sufficient for us to verify that your child is eligible for the meal benefits he or she is receiving.

We appreciate your cooperation and support during this process. If you have any questions concerning our program, please feel free to contact our office.

Sincerely,

---

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## VERIFICATION SUMMARY

The following is a brief summary of the verification requirements and the approved sample selection methods.

**Note: Students who have been approved for free meals through the direct certification process are not to be included in the verification procedure.**

- Sample Date - Final verification sample size is based on approved applications on file as of October 31 of each school year. An application is counted as one application regardless of whether it is a multi-child application or an application for one child. The sample size depends on the number of paper applications, not the number of children represented. Sample selection and verification may begin earlier based on projections done by school officials.
- Sample Method - Each Local Education Agency must select one of the following methods to satisfy the verification requirement:
  - Random Sample - At least 3% of approved applications selected randomly; or
  - Focused Sample\* - At least 1% of total approved applications selected from non-Food Stamp/Temporary Assistance households with income near the eligibility levels, plus .5% (1/2%) of the total number of applications that were approved based on categorical eligibility, selected from applications with a Food Stamp or Temporary Assistance number; or
  - 100% Verification - LEAs may elect to verify all approved applications.
- Sample Size - Note: If using Direct Certification process, do not include numbers of children certified under direct certification procedures in sample size.
- Notification - Households selected for verification must be given written notice.
- Completion date - All verification activity must be completed by December 15 of each school year.
- Documentation - Document the verification results by completing the verification documentation form on the back of this sheet.
- Focused Sampling could be accomplished as follows, using for this example a LEA with 900 approved applications which includes 600 Food Stamp/Temporary Assistance households:
  1. Count all approved applications, including Food Stamp/Temporary Assistance households, to determine the number required to fill the 1% non-Food Stamp/Temporary Assistance sample size. ( $1\% \times 900 = 9$ )
  2. Separate applications into two groups, non-Food Stamp/Temporary Assistance and Food Stamp/Temporary Assistance households.
  3. From the non-Food Stamp/Temporary Assistance group, randomly select the sample of households (9) from households that report monthly income within \$100 below the income eligibility limit and proceed to verify their income.
  4. From the Food Stamp/Temporary Assistance group determine the number required to fill the .5% sample size. ( $.5\% \times 600 = 3$ )
  5. Submit a list of the selected names (3) and case numbers to the Food Stamp/Temporary Assistance office for confirmation of current receipt of Food Stamp/Temporary Assistance or request a current "Notice of Eligibility" from the household.